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*Counsel for Defendant Meta Platforms, Inc.*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

RICHARD KADREY, *et al.*,  
  
Individual and Representative Plaintiffs,  
  
v.  
  
META PLATFORMS, INC., a Delaware  
corporation;  
  
Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF JUDD LAUTER**

1 I, Judd Lauter, declare as follows:

2 1. I am a Special Counsel at the law firm of Cooley LLP and am counsel to Defendant  
3 Meta Platforms, Inc. ("Meta") in the above-captioned case. I have personal knowledge of the facts  
4 contained in this Declaration and, if called upon as a witness, could competently testify to them  
5 under oath.

6 2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the  
7 November 13 and 14, 2024 30(b)(6) deposition of Michael Clark.

8 3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the index  
9 pages for the 30(b)(6) depositions transcripts of Michael Clark. These excerpts demonstrate that  
10 mitigations were discussed extensively during his many hours of on the record, and very few  
11 privilege objections were made.

12 4. Based on our review of notes and emails, neither "seeding" nor any similar concept  
13 was raised by Plaintiffs in the context of Meta's 30(b)(6) topics or testimony until counsel  
14 questioned Mr. Clark about seeding on November 19.

15  
16 I declare under penalty of perjury that the foregoing is true and correct. Executed on this  
17 8th day of January 2025 at Berkeley, California

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20 /s/ Judd Lauter  
Judd Lauter

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